

# Michael Faillace & Associates, P.C.

Employment and Litigation Attorneys

60 East 42<sup>nd</sup> Street, Suite 4510  
New York, New York 10165

Telephone: (212) 317-1200  
Facsimile: (212) 317-1620

May 4th, 2018

**Via ECF**

Honorable Lorna G. Schofield.  
United States District Judge  
Daniel Patrick Moynihan  
United States Courthouse  
40 Foley Square  
New York, NY 10007

**Re: Flores, Carrasco, et al. v. NYC Pasta and Risotto Co. LLC, et al.;**  
**17-cv-6915 (LGS)**

Dear Judge Schofield:

I represent Plaintiffs in the above referenced matter and submit this letter, on behalf of both sides to advise the Court of the status of this case. Plaintiffs have taken the deposition of Defendant Satinder Sharma but have yet to take the deposition of Defendant Daniel Montoya.

Counsel for Plaintiffs and Defendant are trying to schedule a deposition for Mr. Montoya within the coming week between May 7<sup>th</sup>, 2018 and May 11<sup>th</sup>, 2018 in order to keep the existing May 18<sup>th</sup>, 2018 discovery end date.

The parties respectfully ask that the Court permit the parties to have until May 29<sup>th</sup>, 2018 to schedule this last deposition in the event they cannot settle on a mutually convenient date this coming week. The case management conference is set for May 30<sup>th</sup>, 2018 in this matter so the requested extension would not alter other pending deadlines and would allow the Court to maintain the trajectory of this matter.

At this time, the parties do not think that a settlement conference would be productive.

Respectfully Submitted,

/s/ *Colin Mulholland, Esq.*  
Colin Mulholland, Esq.